

**DUANE MORRIS LLP**

Gregory P. Gulia

1540 Broadway

New York, New York 10036-4086

Tel.: (212) 692-1000

Fax: (212) 692-1020

And by: Edward M. Cramp (prospective *pro hac vice*)

Michelle Hon (prospective *pro hac vice*)

Attorneys for MP3TUNES and MICHAEL ROBERTSON

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CAPITOL RECORDS, INC.; CAROLINE  
RECORDS, INC.; EMI CHRISTIAN MUSIC  
GROUP INC.; PRIORITY RECORDS LLC;  
VIRGIN RECORDS AMERICA, INC.;  
BEECHWOOD MUSIC CORP.; COLGEMS-EMI  
MUSIC INC.; EMI APRIL MUSIC INC.; EMI  
BLACKWOOD MUSIC; EMI FULL KEEL  
MUSIC; EMI GOLDEN TORCH MUSIC CORP.;  
EMI LONGITUDE MUSIC; EMI VIRGIN  
MUSIC, INC.; EMI VIRGIN SONGS, INC.;

Plaintiffs,

-against-

MP3TUNES, LLC and MICHAEL ROBERTSON

Defendants.

Civil Action No. 07-CV-9931(WHP)

**NOTICE OF MOTION FOR  
ADMISSION *PRO HAC VICE*  
OF EDWARD MAURICE  
CRAMP**

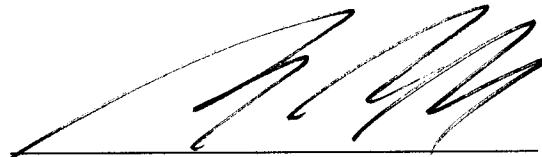
FILED  
U.S. DISTRICT COURT  
2008 JAN 31 PM 3:27  
S.D. OF N.Y.

PLEASE TAKE NOTICE that, upon the annexed Declaration of Gregory P. Gulia on January 30, 2008, defendant MP3TUNES, LLC and Michael Robertson will move this Court before the Honorable William H. Pauley, III, at the United States District Court, 500 Pearl Street, New York 10007, for an order pursuant to Local Civil Rule 1.3(c) granting the admission *pro hac vice* of

Edward Maurice Cramp  
Duane Morris LLP  
101 West Broadway  
Suite 900  
San Diego, CA 92101-8285  
Tel.: (619) 744-2223  
Fax: (619) 889-2434  
EMCramp@duanemorris.com

to practice before this Court in the above captioned action. Edward Maurice Cramp is a member in good standing of the Bar of the State of California and Illinois. There are no pending disciplinary proceedings against Edward Maurice Cramp in any State or Federal court.

Dated: New York, New York  
January 30, 2008



GREGORY P. GULIA

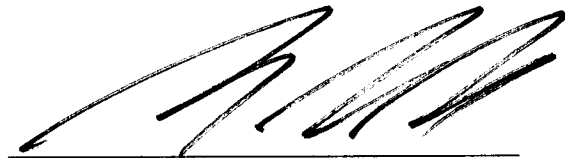
**CERTIFICATE OF SERVICE**

This is to certify that I caused the foregoing Notice of Motion for Admission *Pro Hac Vice* of Michelle Ann Hon, Declaration of Gregory P. Gulia in Support of Motion for Admission *Pro Hac Vice* of Michelle Ann Hon, and Proposed Order for Admission *Pro Hac Vice* of Michelle Ann Hon to be served on the following individuals by first class mail:

**Andrew Harrison Bart**  
Jenner & Block LLP (NYC )  
919 Third Avenue, 37th Floor  
New York, NY 10022

**Steven Bernard Fabrizio**  
**Brian Hauck**  
Jenner & Block LLP  
601 Thirteenth Street, N.W., Suite 1200 South  
Washington, DC 20005

This the 30<sup>th</sup> day of January, 2008.

A handwritten signature in black ink, appearing to read 'GREG P. GULIA', written over a horizontal line.

GREG P. GULIA

**DUANE MORRIS LLP**

Gregory P. Gulia  
1540 Broadway  
New York, New York 10036-4086  
Tel.: (212) 692-1000  
Fax: (212) 692-1020  
And by: Edward M. Cramp (prospective *pro hac vice*)  
Michelle Hon (prospective *pro hac vice*)

Attorneys for MP3TUNES and MICHAEL ROBERTSON

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, INC.; CAROLINE  
RECORDS, INC.; EMI CHRISTIAN MUSIC  
GROUP INC.; PRIORITY RECORDS LLC;  
VIRGIN RECORDS AMERICA, INC.;  
BEECHWOOD MUSIC CORP.; COLGEMS-EMI  
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MUSIC; EMI GOLDEN TORCH MUSIC CORP.;  
EMI LONGITUDE MUSIC; EMI VIRGIN  
MUSIC, INC.; EMI VIRGIN SONGS, INC.;

Plaintiffs,

-against-

MP3TUNES, LLC and MICHAEL ROBERTSON

Defendants.

-----X

Civil Action No. 07-CV-9931(WHP)

**DECLARATION OF  
GREGORY P. GULIA  
IN SUPPORT OF MOTION  
FOR ADMISSION  
*PRO HAC VICE* OF  
EDWARD MAURICE CRAMP**

STATE OF NEW YORK     )  
                                  : ss.:  
COUNTY OF NEW YORK    )

GREGORY P. GULIA, under penalty of perjury, hereby declares:

1. I am a partner of the firm Duane Morris LLP, counsel for defendants

MP3TUNES, LLC and MICHAEL ROBERTSON in the above-captioned action. I am fully

familiar with the facts contained herein. I submit this motion, pursuant to Local Civil Rule 1.3(c), for an order admitting *pro hac vice* Edward Maurice Cramp to practice before this Court in the above-captioned action.

2. I am a member in good standing of the bar of the State of New York and am admitted to the bar of the United States District Court for the Southern District of New York. I am in good standing with this court.

3. Edward Maurice Cramp is a member in good standing of the State Bar of California and the State Bar of Illinois. Original Certificates of Good Standing issued by the State Bar of California and Illinois within the last thirty days is annexed as Exhibit A.

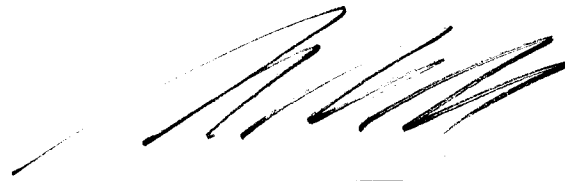
4. I have found Edward Maurice Cramp to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. I respectfully submit a proposed order granting the admission of Edward Maurice Cramp *pro hac vice*, annexed as Exhibit B.

WHEREFORE, it is respectfully requested that this Court admit *pro hac vice* Edward Maurice Cramp to practice before this Court in the above-captioned action.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
January 30, 2008

  
\_\_\_\_\_  
GREGORY P. GULIA



THE  
STATE BAR  
OF CALIFORNIA

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180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

January 23, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, EDWARD MAURICE CRAMP, #212490 was admitted to the practice of law in this state by the Supreme Court of California on February 9, 2001; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

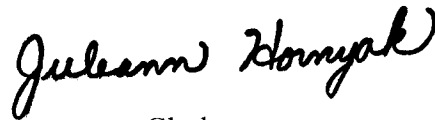
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Edward Maurice Cramp

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 18, 1996 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Friday, January 18, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
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:  
CAPITOL RECORDS, INC.; CAROLINE :  
RECORDS, INC.; EMI CHRISTIAN MUSIC :  
GROUP INC.; PRIORITY RECORDS LLC; :  
VIRGIN RECORDS AMERICA, INC.; :  
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MUSIC INC.; EMI APRIL MUSIC INC.; EMI :  
BLACKWOOD MUSIC; EMI FULL KEEL :  
MUSIC; EMI GOLDEN TORCH MUSIC CORP.; :  
EMI LONGITUDE MUSIC; EMI VIRGIN :  
MUSIC, INC.; EMI VIRGIN SONGS, INC.; :  
:

Plaintiffs,

-against-

MP3TUNES, LLC and MICHAEL ROBERTSON :

Defendants.  
-----X

Civil Action No. 07-CV-9931(WHP)

**[PROPOSED] ORDER FOR  
ADMISSION *PRO HAC VICE*  
OF EDWARD MAURICE  
CRAMP**

Upon consideration of the motion of Gregory P. Gulia, attorney for defendant

MP3TUNES, LLC and Michael Robertson, and said sponsor attorney's declaration in support of;

IT IS HEREBY ORDERED that

Edward Maurice Cramp  
Duane Morris LLP  
101 West Broadway  
Suite 900  
San Diego, CA 92101-8285  
Tel.: (619) 744-2223  
Fax: (619) 889-2434  
EMCramp@duanemorris.com



is hereby admitted *pro hac vice* to practice before this Court in the above-captioned action.

SO ORDERED:

January\_\_, 2008

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Honorable William H. Pauley, III  
United States District Judge